



# Hamilton County, Indiana

2016 Draft Consolidated Annual Performance and Evaluation Report

To Be Submitted: December 28, 2017

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## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Hamilton County receives an annual allocation of Community Development Block Grant (CDBG) funds to assist with affordable housing, public infrastructure and social services. The allocation comes directly from the US Department of Housing and Urban Development. The Noblesville Housing Authority administers the CDBG funding on behalf of the Hamilton County Commissioners. For fiscal year 2016, Hamilton County received \$874,099. The fiscal year ran from October 1, 2016 until September 30, 2017. During the fiscal year Hamilton County expended \$1,499,523.03 on fifty-one open activities.

In order to receive CDBG funding Hamilton County must prepare a five year comprehensive plan and an annual action plan the describes how funding will be spent to meet the goals and strategies developed in the five year comprehensive plan. To achieve these goals Hamilton County partners with a variety of organizations working towards specific goals. This year end report, or CAPER, will report the progress made during the third year of the Consolidated Plan.

In fiscal year 2016, Hamilton County completed six (6) home repairs. Additionally, Hamilton County is working with two non-profit Developers on four activities that will create additional affordable housing in Hamilton County. As these activities are completed they will be reported in future reporting.

Hamilton County works with a variety of public service agencies. During 2016 \$154,969.42 was expended on eligible public service activities serving 9,213 people with a variety of supportive services for eligible clients including medical services, emergency housing and services for victims of domestic violence, services for the developmentally disabled, senior services and legal services.

Hamilton County spends a large percentage of its funding each year on infrastructure projects in four participating communities, the Cities of Carmel, Fishers, Noblesville and Westfield. Hamilton County expended \$994,012.39 on infrastructure projects in 2016. Additionally, Hamilton County expended \$204,481 on Storm Sewer improvements in an eligible unincorporated neighborhood. Several infrastructure activities were not completed by the end of the 2016 fiscal year and will be fully reported on in the 2017 CAPER.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing - Domestic Violence Shelter	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	486	2,430.00%			
Housing - Owner Occupied Repair	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	6	24.00%	8	6	75.00%
Housing - Rental Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	10	0	0.00%			
Housing - Rental Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	10	0	0.00%	3	0	0.00%
Public Facilities - Seniors	Non-Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	0	0.00%			
Public Facility Improvement	Non-Housing Community Development		Other	Other	4	0	0.00%			

CAPER

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Public Infrastructure - Neighborhood Improvements	Non-Housing Community Development	CDBG: \$431050	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	5258	210.32%	8000	10528	131.60%
Self Sufficiency - Basic Public Services	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	2020	202.00%			
Self Sufficiency - Domestic Violence Shelter Op.	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	467		0		
Self Sufficiency - Domestic Violence Shelter Op.	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	100	19	19.00%		0	
Self Sufficiency - Legal Services and Fair Housing	Non-Housing Community Development	CDBG: \$199819	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%	1100	1364	124.00%
Self Sufficiency - Legal Services and Fair Housing	Non-Housing Community Development	CDBG: \$199819	Other	Other	0	0		1	1	100.00%
Self Sufficiency - Transportation	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%			

CAPER

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Hamilton County CDBG program directed funding to programs and projects that meet the following criteria:

- Meet a goal of the 2014-2018 Consolidated Plan
  - Expand the supply of safe, decent affordable housing.
  - Support programs that help the most vulnerable households achieve self-sufficiency.
  - Invest in public facility and public infrastructure needs of low-income neighborhoods.
  - Improve institutional structure and coordination among providers across the County.
- Demonstrate a significance of need
- Serve an eligible area within Hamilton County
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project
- Benefits persons at-risk of homelessness or who are homeless
- Benefits a special needs population

As an urban county Hamilton County works with its incorporated communities to assist with eligible CDBG activities throughout the county. Though there are eight incorporated areas in Hamilton County, four have opted out to pursue larger amounts of CDBG funding the State of Indiana Small Cities Program. The communities of Arcadia, Atlanta, Cicero and Sheridan have all opted out of the Hamilton County program. While they have been successful in applying for and receiving state funding for large infrastructure activities, by opting out, the county cannot expend CDBG funds in those communities for public services or housing activities such as home repair. These communities must depend upon not for profit agencies to provide these services as they can.

As a result of the limits HUD places on the funding amounts for public services (15%), most of the CDBG funding is used for major infrastructure activities in the participating communities of Carmel, Fishers, Noblesville and Westfield. Funding is also used for housing activities as projects are developed. The county works with each of the participating community's to identify eligible activities and infrastructure needs. Each activity must take place in an eligible census tract or serve an eligible community and should also have a positive visual impact in the neighborhoods they serve.

During FY 2016 public service activities served 9,213 persons, exceeding established goals for the year. NHA worked with services providers on

reporting and attainment of goals. Though no new rental units went on line this year HAND is completing 10 units of affordable rental housing that will be ready in 2018 and Habitat has several builds in the pipeline or 2018 on lots they purchased with CDBG funding. Public infrastructure activities completed in FY16 serve 10,528 households and included flood and draining improvements as well as sidewalk improvements.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	8,631
Black or African American	392
Asian	171
American Indian or American Native	11
Native Hawaiian or Other Pacific Islander	5
<b>Total</b>	<b>9,210</b>
Hispanic	626
Not Hispanic	660

### Narrative

Hamilton County is predominately white and those served by the CDBG programs are likely to be white as a result. The 2010 Census showed the county population to be 88 percent white. In 2016, 89.6 percent of the beneficiaries served by the program were White. This is slightly higher percent of white beneficiaries as it is approximately 2 percent higher than the percent of White persons in Hamilton County.

The Hamilton County CDBG program served 995 minority individuals and families in the 2016 fiscal year, accounting for 10.4 percent of the total served. In FY 2016, 626 people, or 6.5 percent identified themselves as Hispanic. Hamilton County will continue to encourage all subrecipients to promote their services and products to minority populations.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	874,099	1,499,523
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 1 - Resources Made Available

### Narrative

All recipients of CDBG funding have requirements dictating the rate at which the funds should be spent. The requirement states each recipient shall have no more than 1.5 times its annual allocation 60 days prior to the close of the fiscal year. For FY16 Hamilton County's expenditure rate was 1.15, meaning that the county is well within its required ratio of spending to grant award. Hamilton County will continue to make every effort through monitoring of programs to ensure that activities and funding continue to move forward in an expeditious manner.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Carmel	13	27	The City of Carmel used CDBG funding to extend 956 linear feet of sidewalk and 1,919 LF of Storm Sewer
City of Fishers	14	15	Fishers completed sidewalk and street improvements in Pine/Roxbury and ADA improvements in the Sunblest area
City of Noblesville	13	24	Noblesville completed sidewalks on Logan Street and Infrastructure improvements in the southwest quadrant
City of Westfield	7	0	
County wide	53	0	
Eligible Township Census Tracts			

### Narrative

During FY16, infrastructure activities accounted for \$994,012.39 of the total CDBG funding spent which was \$1,499,523.03.

The City of Carmel used several years of CDBG funding to extend 956 linear feet of sidewalk and 1,910 linear feet of drainage infrastructure on Oswago Road. Total project cost was \$715,079 using \$404,070 of CDBG funds and \$311,009 of other funding. The activity took place in eligible Census Tract 11105 BG 2.

Fishers completed two infrastructure projects during FY16. The first activity included sidewalk and street improvements in the Pines/Roxbury neighborhood. The total CDBG award was \$288,682.72 from FY11, FY12 and FY13. This activity was made eligible with an income survey of the neighborhood. The second activity is an Americans with Disabilities Act sidewalk repair project in the Sunblest neighborhood to reduce trip hazards. The total CDBG allocation for the Sunblest project is \$196,993.80 from FY14, FY15 and FY16.

The City of Noblesville completed two infrastructure activities during FY16 and has a third activity underway. The first activity replaced sidewalks on Logan street using \$86,091 of FY14 funding. The second activity replaced 2,575 linear feet of sidewalk in the southwest quadrant using \$115,001.22 of FY15 funding. Both of these activities were completed during FY16. The third activity is using FY16 funding to upgrade and replace park equipment in Southside Park as well as improve sidewalks leading to the park. This activity will be fully reported in the FY17 CAPER.

The City of Westfield used \$109,899.30 of CDBG funding to install 1,008 linear foot of 5 foot wide sidewalk along the east side of North Union Street from Beechwood Drive to Maple Park Drive.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

Hamilton County encourages efforts by Carmel, Fishers, Noblesville and Westfield to leverage federal investments as part of public infrastructure projects in their communities. During the 2016 fiscal year . Carmel used \$311,009 of other public funding to complete their activity. Additionally, many public service activities used additional funding to serve Hamilton County residents.

The Hamilton County CDBG program did not utilize any public owned land or property to address a need identified in the Consolidated Plan.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	18	6
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>18</b>	<b>6</b>

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	234
Number of households supported through The Production of New Units	10	0
Number of households supported through Rehab of Existing Units	8	6
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>18</b>	<b>240</b>

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The Hamilton County Home Repair program is dedicated to assisting low and moderate income homeowners with repairs of emergency nature. Repairs include emergency heat repair, plumbing, electrical or roof leak repairs. During the 2016 fiscal year, the program assisted six homeowners, expending \$17,423.

The Hamilton County Area Neighborhood Development (HAND) purchased one property using \$180,000 of CDBG funding. This project is under construction currently and is expected to be completed in March of 2018. The project is located in Home Place and will consist of 10 units comprised of eight 1 and 2 bdrm duplexes for seniors 55 and older and two single family homes with three bdrms reserved for survivors of violent crime. The completion of this project as well previous projects will help Hamilton County develop reach its five-year rental affordable housing goals from the 2014 Consolidated Plan.

221 – Habitat 8<sup>th</sup> Street build. This project is on hold as Habitat is focusing their resources on other projects at tHamilton County has funded Habitat for Humanity of Hamilton County in previous years for three currently open Activites as follows:

Activity 253 – Combs Ave. – This project is on hold but is due to be Habitat’s next construction project in 2018. Initial delays involved being able to get utility, water, and sewery hook ups to the property with the City of Carmel. These issues appear to be resolved with the next Habitat build scheduled to be this property in 2018.

Activity 259 – Cherry Tree Road – This project is on hold at the moment though issues with initial delays are being worked out. The project has been delayed due to issues with running water, sewer, and utilities to the site. Adjacent land has recently been purchased by a property developer who plans on developing the land into residential housing with plans to bring utilities to the site. This will allow Habitat to run their own lines to their own site. This project is still on hold though and is not expected to be completed in 2018.

**Discuss how these outcomes will impact future annual action plans.**

Though Hamilton County has made progress achieving many of the goals outlined in the 2014-2018 Consolidated Plan there are steps tha could be taken to promote completion of activities in a more timely manner. Several steps the county is exploring include:

- Enforce the contract language requiring recipients and grantees to complete activities and draws in a timely manner
- Direct more funding towards projects that meet goals not completed in 2016
- Update applications to require documentation of additional funding if required. Also require documentation of progress made by the applicant if there are zoning issues or the activity requires extension of infrastructure.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	11	0
Low-income	55	0
Moderate-income	172	0
<b>Total</b>	<b>236</b>	<b>0</b>

**Narrative Information**

Hamilton County must follow the income guidelines set by the US Department of Housing and Urban Development when serving individuals and households. These guidelines are set for metropolitan areas each year. Hamilton County is included as part of the Indianapolis Metropolitan Statisical Area, and

must follow the limits set for the entire area. Many of individuals served by public services in the 2016 fiscal year, were extremely low income individuals, earning below 30 percent of the area median income. Included in the table above are recipients of subsistence payments. These payments prevent homelessness allowing families to remain in their homes.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Hamilton county funds several organizations that assist homeless individuals as was special needs populations. One program that targets the homeless population is Alternatives of Madison County. This shelter, although located outside Hamilton County, serves many domestic violence victims from Hamilton County. In fiscal year 2016 it served 19 victims of domestic violence, each seeking shelter from their housing situations in Hamilton County. Prevail also serves Hamilton County victims of domestic violence including homeless prevention. In 2016 they served 451 victims.

Homeless individuals can also be served by other local services funded with CDBG funds, such as the Trinity Free Clinic, Hope Family Care Clinic, Heart and Soul Clinic and the Good Samaritan Network. These providers can serve as the first line of services for homeless individuals reaching out in Hamilton County for help. However, the reports provided to the Noblesville Housing Authority, the CDBG administrator, do not include homelessness status.

Individuals and households at-risk of homelessness can seek help through emergency assistance programs and payments at the local Salvation Army and St. Vincent de Paul. These programs provide emergency payments for extremely low and low income residents of Hamilton County. The payments can be used for a variety of emergency uses including utilities, rent or mortgage, car repairs, etc.. This program is coordinated through the township trustees and is the last opportunity for families trying to avoid a homeless situation. 234 individuals received assistance through this program in fiscal year 2016.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Alternatives of Madison County shelters victims of domestic violence from Hamilton County, offering a temporary and safe place to live. Beyond the shelter, Alternatives of Madison County has a Transitional Housing Program, assisting individuals and families as they move from the shelter to permanent housing. This supportive housing program can last up to two years as the families establish lives outside of domestic violence.

The program is located in Anderson, Indiana, Northeast of Hamilton County, and offers a variety of services for domestic violence victims. Services include 24-hour crisis center and response team, emergency transportation, case management, support and advocacy and children's services. During the 2016 fiscal year, Hamilton County served 19 domestic violence victims through the Alternatives program.

Due to low point in time count numbers in Hamilton County, homeless services and shelters are often placed in other counties where a need and number of homeless individuals is greater. Families with

children continue to seek shelter in neighboring counties, Madison County or Marion County.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Hamilton County awarded \$20,000 to the Salvation Army and \$15,000 to St. Vincent de Paul in FY16 to help with homelessness prevention. Both organizations offer rent and mortgage assistance for households at risk of losing their housing either through eviction or foreclosure. The program coordinates with township trustees to find families and households needing this service. For many families, this program is the last opportunity to avoid homelessness. In fiscal year 2016, the programs assisted 234 households.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The Homeless Prevention and Rapid Rehousing Program (HPRP) was created by funds from Title XII of the American Recovery and Rehabilitation Act of 2009 (ARRA). It allows expanded prevention and/or rapid rehousing for persons with moderate barriers to stable permanent housing.

The idea behind HPRP is to put “housing first,” placing a homeless individual in permanent housing, then providing the services needed to that individual or household to keep them housed. Previously, the common method was to address needs of the individual or household at the shelter, working towards a transitional housing situation and then permanent housing. The housing first model stabilizes housing for the household first, helping the household feel more secure and able to address the other needs in their lives.

Hamilton County is part of Region 8 in the State of Indiana Continuum of Care, made up of four counties. Building on HPRP’s success, the Emergency Solutions Grant changed from a emergency shelter grant to follow the model of placing homeless households in permanent housing, and supporting housing with services.

Many stakeholders continue to state the greatest need of low income individuals is the development of



more affordable housing for extremely low income households. This follows a housing first model of addressing homelessness, placing individuals in permanent housing that is affordable over sheltering them for 60-90 days before placing them in housing. While there remains a planning committee for the development of a Domestic Violence shelter, the CoC for Region 8 is advocating for more affordable rental housing in Hamilton County so that households who are homeless or at-risk of homelessness do not have to exit the County in search of housing.

Hamilton County funded one affordable rental housing projects in fiscal year 2016 Home Place Garden. The project will add 10 new affordable rental housing options for residents and will be completed in 2018. Hamilton Area Neighborhood Development, Inc. (HAND) is the non-profit developer. HAND is one of two non-profit developers working to address the affordable housing shortage in Hamilton County.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The Noblesville Housing Authority (NHA) is the public housing agency serving Hamilton County by means of a cooperative agreement with the State Housing Authority also known as the Indiana Housing & Community Development Authority (IHCDA). It does not manage public housing units as its neighboring housing agencies in Anderson and Indianapolis. The Noblesville Housing Authority only offers the Housing Choice Voucher (HCV) program a/k/a Section 8 vouchers to the low-income households. The Section 8 voucher program offers subsidy to a household to allow them to rent any residential unit in the local housing authorities' jurisdiction. The household will pay approximately 30 percent of their monthly adjusted income towards monthly housing costs and the Housing Choice Voucher covers the remaining cost.

IHCDA also has a voucher program serving Hamilton County with a total of 90 households receiving assistance. Households receiving assistance from the IHCDA program do not need to transfer into the NHA program in order to receive assistance in the Hamilton County jurisdiction. Traditionally, if a voucher recipient wants to move to another jurisdiction, the local housing authority would provide the voucher and bill the previous jurisdiction for the cost of servicing the transfer household. The cooperative agreement between the NHA and IHCDA has enabled more households to benefit from the services and amenities in Hamilton County and has enabled greater choice for voucher recipients without the additional paperwork that is associated with HCV portability.

The most immediate need for the NHA is finding additional funding to provide voucher assistance. The NHA has an Annual Contribution Contract (ACC) with HUD for 185 Housing Choice Vouchers monthly (HCV); however, the funding NHA is currently receiving does not support 185 families monthly.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The Noblesville Housing Authority does not own or manage housing units and only administers a voucher program. The voucher program is a basic rental assistance program. Section 8 vouchers, from the U.S. Department of Housing and Urban Development (HUD) allow households to access housing that would not be affordable to them. The household pays approximately 30 percent of their adjusted monthly income and the voucher pays the remainder of the rent owed to the landlord.

The NHA also does not offer homeownership with its program to voucher holders. Most voucher holders are elderly or disabled and prefer rental housing as maintenance on a home can prove to be challenging. Any voucher holder interested in homeownership is referred to the Indianapolis Neighborhood Housing Partnership in Marion County, an agency with a mission to counsel low and moderate-income households and promote homeownership.

### **Actions taken to provide assistance to troubled PHAs**

The Noblesville Housing Authority does not have a troubled status. Since the Section 8 Management

Assessment Program (SEMAP) began in 1998, Noblesville Housing Authority has consistently been rated a High performing housing authority.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes a few universal barriers. Local and state regulations on zoning and building are the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations. Hamilton County created a new Analysis of Impediments to Fair Housing in Fiscal Year 2015. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.
- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

The draft Hamilton County Analysis of Impediments to Fair Housing did not find any types of zoning that impose limits on housing. However, since this draft was written, a discrimination complaint has been filed alleging discrimination in the form of two Noblesville ordinances, Ordinance 32-6-08 and Ordinance 21-06-13, that limit the size of units to two bedrooms or smaller as well as prohibits the use of federal, state, or local rent subsidies for two Noblesville area developments known as Noble West and Promenade Landing. The county is working with all the participating communities and the complainant to resolve this issue.

Additionally, the AI discussed other barriers that prevent, or increase the challenge of affordable housing development. The barriers include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development
- The lack of transportation where creation of affordable housing development is less of a financial challenge
- Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low income renters with challenges such as short employment history and credit history

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Hamilton County has set goals to develop rental housing for underserved needs households in the community, including extremely low-income households, senior households, or recently homeless households. Though no new units were completed during FY16, HAND is currently constructing a 10 unit rental project that will serve low income seniors. Future projects are still in the planning phases.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The Hamilton County Health Department recommends that children six (6) years old and under be screened for lead, particularly those children living in, regularly visiting or attending a child care facility built before 1978 should be tested. The local health department also provides guidance to address any concerns parents or guardians might have as well as guidance for renovating and clean up lead based paint hazards.

Any households with children who test high for lead paint blood levels may be referred to the Noblesville Housing Authority or HAND. Funding from the owner occupied assistance program may resolve lead based paint hazards found in the home. Any work completed was in compliance with the Environmental Protection Agency's lead based paint rules and regulations. However, none of the units receiving emergency repairs in 2016 reported lead paint hazards or lead paint reduction work.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

In 2014, Hamilton County adopted a new anti-poverty policy. This strategy is crucial for demonstrating the Noblesville Housing Authority's commitment to tackling poverty. The Noblesville Housing Authority, in partnership with the social service and housing providers in the community, will strive for the goals and strategies below to help households stay out of poverty or become self-sufficient and elevate themselves from living in poverty.

- Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next year include case management services, health services, food pantries, child care and transportation.
- Provide economic development opportunities to low to moderate-income families. Programs and activities to be funded over the next year include job training and placement and promotion of Section 3 opportunities.
- Provide affordable housing opportunities to low and moderate-income households – specifically identifying rental housing projects that are affordable to households earning incomes below 30 percent of the area median income.
- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers.

Hamilton County funded a variety of social service projects to assist low-income families and individuals, many who live below the poverty line. Hamilton County funded programs such as the Trinity Free Clinic, Shepherd Center, Heart and Soul Clinic, HOPE Clinic, Meals on Wheels, Neighborhood Christian Legal Clinic, and Prevail. Of those served by these agencies, most of the individuals earned income less than 30 percent of the median income.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The 2017 Action Plan stated that the institutional structure currently used to develop affordable housing may face organizational and other non-regulatory barriers to affordable housing development. Consultations with community leaders and stakeholders have suggestions as to the barriers that the hard data may not provide. These include barriers that prevent, or increase the challenge of affordable housing development. The barriers shared by those leaders and stakeholders include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development
- The lack of transportation where creation of affordable housing development is less of a financial challenge
- Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low income renters with challenges such as short employment history and credit history

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The Good Samaritan Network is the primary way to connect all service providers throughout Hamilton County. The network includes a variety of providers, from large/corporate health providers to smaller, faith based food pantries. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year.

Hamilton County and the Noblesville Housing Authority want to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

Hamilton County created a new Analysis of Impediments to Fair Housing in Fiscal Year 2015. The new analysis confirmed the greatest impediment to fair housing is the lack of affordable housing in Hamilton County. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.

- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

In the past, the Noblesville Housing Authority has offered training opportunities for local landlords, developers and real estate professions to learn about the federal and state fair housing laws and topics related to fair housing. The Noblesville Housing Authority works with fair housing organizations to provide the fair housing training in fiscal year 2016. Through greater education, Hamilton County strives to increase local capacity and public awareness in the community. Over time, with more educated professionals, the disparate treatment in the rental market will decrease.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Monitoring assures that recipients of federal funds are in compliance with local objectives and federal program requirements. The intent of the Noblesville Housing Authority is to work cooperatively with contractors, grantees and sub-recipients in the use of federal funds as best as possible and within reasonable time constraints.

### *Initial Review of Project Eligibility*

1. Requests for funding must be supported with an application to be reviewed for allocation recommendation. Applications include specific information regarding design of project, cost of project and beneficiaries.
2. Each activity must be eligible under related program rules and must meet one of the three national objectives.
3. An activity must be consistent with local goals and objectives as expressed in adopted policies and/or established plans and must comply with related program regulations.
4. Successfully funded applicants are required to sign a funding agreement outlining all of the requirements, regulations and standards.

### *Ongoing Review of Project Compliance*

1. On-site monitoring will be conducted as may be deemed necessary and reasonable by the Noblesville Housing Authority. Desk reviews and off-site monitoring will be an ongoing activity.
2. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
3. Quarterly, monthly, and/or annual reports on project and activity status is required of all sub-recipients.
4. The program manager will also monitor for beneficiary compliance.
5. The Noblesville Housing Authority (NHA) programs generally do not include program income to the sub-recipient/contractor.

### *Follow-up and Enforcement*

1. Compliance concerns are addressed at all phases of an activity, as soon as the project manager is aware of the issue. Technical assistance is provided as necessary to maintain compliance.
2. Annual reviews of sub-recipient activities are conducted by the project manager, using a checklist of areas to be reviewed.
3. Sub-recipients may be required to file a Certified Public Accountant (CPA) annual report of sub-recipient's financial stability and federally funded project expenditures. Records shall be maintained for five years after project closeout.
4. Enforcement of activities not in compliance shall follow Part 85.43 with the right of appeal, as well as termination of a contract/agreement.



Hamilton County encourages the use of minority (MBE), women (WBE) and veteran (VBE) owned businesses for each of its programs.

**Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The Noblesville Housing Authority released the 2016 Consolidated Annual Performance and Evaluation Report (CAPER) for comment on December 12, 2017 for a period of 15 days. A copy of the legal ad for the public comment period will be included in the attachments to this document.

Comments will be added at the end of the comment period

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

Hamilton County does not anticipate any changes to the program's objectives or goals in the next year. The goal of reaching the most vulnerable in the community and across Hamilton County is still a priority of the Hamilton County Commissioners.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

**Other Actions**

The FY16 Hamilton County CAPER required several corrections to the PR26 Financial Summary Report. Line 30, the Adjustment to Compute Total Public Service Obligations was adjusted to -\$17,548.93. This adjustment is a result of the following activities:

#124-River Clinic: This activity was closed and the funding was used in the FY16 Trinity Free Clinic in the amount of \$4,953.83. Though it is an eligible PS activity it is throwing the Public Service cap of the 15% annual maximum.

#306-JANUS Developmental Services. JANUS was awarded funds to complete infrastructure improvements to their building. When the project fell through the funding was accidentally used for a public service activity. These payment in the amount of \$12,595.10 is in the process of being repaid by JANUS and the funds will be returned to the line of credit.

